

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

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JAMES J. BLANCHARD, Governor

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

October 17, 1985

Burroughs Corporation
41100 Plymouth Road
Plymouth, MI 48170
Attn: Richard Terlaak

RE: MID 005358965

Dear Mr. Terlaak:

On October 15, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that investigation, it was determined that your facility qualifies for the small quantity generator status outlined in 40 CFR §261.5 (see attachment) and is in compliance with RCRA. If 1,000 kilograms (2,200 pounds) of hazardous waste is generated per month or is on-site at any time, the facility is subject to the generator standards outlined in 40 CFR Part 262.

Michigan's Hazardous Waste Management Act states that if more than 100 kilograms (220 pounds) of hazardous waste is generated in a calendar month or accumulated at any time, the waste must be disposed of at a facility licensed under the Act.

All liquid industrial waste removed from your facility by another firm must be with a licensed liquid industrial waste hauler and you must use the manifest reporting form.

It is recommended you notify the United States Environmental Protection Agency of your status as a small quantity generator in accordance with the attached small quantity generator information sheet.

If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION

cc: U.S. EPA, Region V
B. Okwumabua

RCRA INSPECTION REPORT

EPA Identification Number: M I D 0 0 5 3 5 8 9 6 5Installation Name: Burroughs CorporationLocation Address: 41100 Plymouth Rd.City: PlymouthState: MI 48170Date of Inspection 10/15/85Time of Inspection (from) 10:30 (to) 11:30

Person(s) Interviewed

Richard Terlak

Title

Env. Coordinator

Telephone

313-453-1400

Inspector(s)

Kenneth L. Damrel

Agency/Title

MDNR/HWD/Env. Eng.

Telephone

313-459-9180

Installation Activity (mark only one box)

Inspection Form(s) --

☐ Treatment/Storage/Disposal per 40 CFR §265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (No Generation or Transportation)

A

☐ Generation and Transportation

B,C

☐ Generation Only

B

☐ Transportation Only

C

None of the above.

The facility is a small quantity generator.

STATE OF MICHIGAN



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DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

July 6, 1983

Mr. Raymond P. Dewyer
Manager, Safety and Security
Burroughs Corporation
41100 Plymouth Road
Plymouth, Michigan 48170

Re: MID 005358965

Dear Mr. Dewyer:

Thank you for your letter of June 24, 1983, which discusses the training program for personnel handling hazardous wastes at the Burroughs Plymouth Plant. It appears to meet the requirements of 40 CFR 265.16 quite completely. I appreciate that you and the plant staff have chosen to deal with this area so thoughtfully and constructively.

Sincerely,

Susan Norton

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

SN/sc

cc: Hazardous Waste Division, Lansing (3)

Burroughs Corporation



PLYMOUTH PLANT

41100 PLYMOUTH ROAD, PLYMOUTH, MICHIGAN 48170

June 24, 1983

RECEIVED

JUN 27 1983

WATER QUALITY DIV.
DIST. I

Susan Norton, Water Quality Specialist
Department of Natural Resources
Compliance Section
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

RE: MID 005358965
February 2, 1983 RCRA Inspection

Dear Ms. Norton:

My apology for this late reporting of the correction of Item 4 (Personnel Training), but I hope that you will agree that it was worth the wait.

Please find attached our new Hazardous Waste Handling and Disposal policy. As it indicates, both the handlers and their supervisors must receive training by this office in order to be licensed for the handling of Hazardous Wastes.

The initial retraining and licensing process has been completed and we will be retraining all persons on a 6-month basis. Both the policy and the training program have been well received by the Union and Plant Management.

Should you have any questions in this regard, please feel free to contact me.

Sincerely,

R. P. Dewyer, Manager
Safety & Security
Plymouth Plant

Attachment.

94 67-8-83
Code A

STATE OF MICHIGAN



James Blanchard, Governor
~~WILLIAM G. MILLER, Governor~~

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
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JOAN L. WOLFE
CHARLES G. YOUNGLOVE

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

April 19, 1983

Mr. Raymond P. Dewyer
Manager, Safety and Security
Burroughs Corporation
41100 Plymouth Road
Plymouth, Michigan 48170

Re: MID 005358965

Dear Mr. Dewyer:

Thank you for your letter of April 11, 1983, documenting corrections to the deficiencies noted during the RCRA inspection of February 2, 1983. It appears to address Items 1-3 and 5 of our letter adequately. We request that you respond by letter no later than May 31, 1983, indicating how Item 4 (Personnel Training) has been corrected.

Again, please feel free to call this office should any further questions arise. Your continued cooperation in resolving this matter is appreciated.

Sincerely,

Kenneth Burda, P.E.
Area Engineer

Susan Norton

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

KB:SN/sc
cc: Hazardous Waste Division, Lansing (3)

Burroughs Corporation



SW

PLYMOUTH PLANT
41100 PLYMOUTH ROAD, PLYMOUTH, MICHIGAN 48170

April 11, 1983

RECEIVED

APR 18 1983

Susan Norton
Department of Natural Resources
Hazardous Waste Division
9311 Groh Road
Gross Isle, Michigan 48138

WATER QUALITY DIV.
DIST. I

RE: MID 005358965 - BURROUGHS PLYMOUTH PLANT
(Your February 10, 1983 Letter)

Dear Ms. Norton:

Pursuant to our April 6, phone conversation, all deficiencies enumerated in the subject letter except for No. 4 (Personnel Training) have been corrected. Positive steps have been instituted to assure against any reoccurrence of these deficiencies.

The Personnel Training issue has proven to be a thornier issue than expected. I hope to have the issue resolved and this training completed within the next 5-6 weeks. I will notify you when this last deficiency is corrected.

Should you have questions in this regard, please contact me.

Sincerely,

R. P. Dewyer
Manager, Safety & Security
Plymouth Plant

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

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DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

#1335

February 10, 1983

CERTIFIED MAIL

Mr. Raymond P. Dewyer
Manager, Safety and Security
Burroughs Corporation
41100 Plymouth Road
Plymouth, Michigan 48170

RE: MID 005358965

Dear Mr. Dewyer:

On February 2, 1983, Susan Norton of this office inspected the Burroughs Plymouth Plant to determine compliance with the provisions of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The inspection indicated the following deficiencies:

1. Some of the drums at the hazardous waste storage pad were not completely packaged or labelled in accordance with Department of Transportation regulations. This is in violation of 40 CFR 262.30, 262.31, and 262.32.
2. Not all drums of waste at the storage pad were marked with the date on which the period of accumulation began. This is contrary to the provisions of 40 CFR 262.34(a)(2).
3. Not all the drums at the storage pad were marked with the words "Hazardous Wastes". This is in violation of the requirements of 40 CFR 262.34(a)(3).
4. Concerning personnel training records, there was no written record that individuals initially trained in 1980 have received an annual review at any time since. Further, there should be documentation that each individual who handles hazardous waste has been trained, not simply his supervisor. These requirements are discussed in 40 CFR 265.16 (incorporated by reference in Part 262, Standards for Generators).
5. There was no hazardous waste Contingency Plan available for inspection. This is required by reference in the Generator Standards to 40 CFR 265.50 and 265.51.



Mr. Raymond P. Dewyer
February 10, 1983
Page 2

We request that you respond by letter no later than March 11, 1983, documenting what actions you have taken to correct the above deficiencies. A copy of the RCRA inspection report is enclosed for your examination. Should you have any questions, please do not hesitate to call us at (313) 675-0860. We wish to thank you for your time and cooperation during the inspection.

Sincerely,

Kenneth Burda, P.E.
Area Engineer



Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

KB:SN/sn
Enclosure
cc: Hazardous Waste Division, Lansing (3)

#1335

II Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
II Treatment/Storage/Disposal (no generation or Transportation)	A
II Generation and Transportation	B, C
II Generation only	<u>B</u>
II Transportation only	C

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>4</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)	<u>X</u>			
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>			
c. Name and EPA ID number of transporter(s)?	<u>X</u>			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>NONE</u>				<u>0077051</u>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>N/A</u>				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

Yes	No	NI	Remarks
-----	----	----	---------

- | | | | | | | |
|-----|--|-------------------|--------------|---------------|---------------|---------------|
| (1) | Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) | 262.30 | <u> X </u> | <u> </u> | <u> </u> | <u> </u> |
| (2) | Are waste packages marked and ^{NO} <u>labeled</u> in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) | 262.31 and 262.32 | <u> X </u> | <u> </u> | <u> </u> | <u> </u> |
| (3) | If required, are placards available to transporter? | 262.33 | <u> X </u> | <u> </u> | <u> </u> | <u> </u> |

** (4) Pre-shipment Accumulation:

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

- | | | | | | |
|-------|--|----------|----------|-------|-------------------------------|
| a. | Is hazardous waste accumulated in containers? If no, skip to b. 262.34 | <u>X</u> | _____ | _____ | _____ |
| i. | Is each container clearly marked with the date on which the period of accumulation began? | _____ | <u>X</u> | _____ | U.I. TRICHLOROETHANE
DRUMS |
| ii. | Have more than 90 days elapsed since the dates marked? | _____ | <u>?</u> | _____ | CANT TELL |
| iii. | Is each container labeled or marked clearly with the words "Hazardous Wastes?" | _____ | <u>X</u> | _____ | _____ |
| iv. | Are containers in good condition? | <u>X</u> | _____ | _____ | _____ |
| v. | Are containers compatible with waste in them? | <u>X</u> | _____ | _____ | _____ |
| vi. | Are containers managed to prevent leaks? | <u>X</u> | _____ | _____ | _____ |
| vii. | Are containers stored closed? | <u>X</u> | _____ | _____ | _____ |
| viii. | Are containers inspected weekly for leaks and defects? | <u>X</u> | _____ | _____ | _____ |
| ix. | Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). | <u>X</u> | _____ | _____ | _____ |

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)	X			THIS SECTION NOT APPLICABLE
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				↓
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

Yes No NI Remarks

THIS SECTION NOT APPLICABLE

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers? _____ X _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

RECORD OF TRAINING IS FOR INDUSTRIAL ENGINEERS, WHO IN TURN TEACH EMPLOYEES THEY SUPERVISE. THERE IS NO RECORD FOR THE INDIVIDUALS WHO ACTUALLY HANDLE THE WASTE.

- i. Job Titles? X _____
- ii. Job Descriptions? X _____
- iii. Description of training? X _____
- iv. Records of training? X _____
- v. Did personnel receive the required training by 5-19-81? X _____
- vi. Do new personnel receive required training within six months? _____ NO NEW HIRES - QUESTION NOT APPLICABLE.
- vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? X _____ THERE HAS BEEN NO ANNUAL REVIEW; INITIAL TRAINING WAS IN 1980.

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31 _____ X _____

Yes No NI Remarks

- ii. If required, does this facility have the following equipment: 265.32

Internal communications or alarm systems?	X	___	___	___
Telephone or 2-way Radios at the scene of operations?	X	___	___	___
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	___	___	___

Indicate the volume of water and/or foam available for fire control:

100,000 GAL TANK OF WATER FOR FIRE CONTROL

- iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	___	___	___
Is emergency equipment maintained in operable condition?	X	___	___	___
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	X	___	___	___
v. Is there adequate aisle space for unobstructed movement?	X	___	___	___
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	X	___	___	___

- f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information: *CONTINGENCY PLAN COULD NOT BE FOUND, WAS NOT AVAILABLE FOR INSPECTION.*

- i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52

SEE PREVIOUS PAGE

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	_____	_____	_____	_____
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	_____	_____	_____	_____
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	_____	_____	_____	_____
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	_____	_____	_____	_____
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	_____	_____	_____	_____
vii. Is the facility emergency coordinator identified?	_____	_____	_____	_____
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	_____	_____	_____	_____
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	_____	_____	_____	_____

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X _____

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

_____ X _____

- a. Exporting Hazardous Waste, has a generator:

NOT APPLICABLE

- i. Notified the Administrator in writing?

- ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

- iii. Met the Manifest requirements?

- b. Importing Hazardous Waste, has the generator met the manifest requirements?

NOT APPLICABLE
